



Mike Bradley <mbradley@utah.gov>

incoming \$

Rim Mine (M/037/0006; 380 SJ-84-1P) Updated Stormwater Pollution Prevention Plan

TASK 7074 response

2 messages

Andrea Reither <AReither@energyfuels.com>

Tue, Dec 22, 2015 at 2:22 PM

To: "McDougall, Ted" <tmcdouga@blm.gov>, Mike Bradley <mbradley@utah.gov>

Cc: Scott Bakken <SBakken@energyfuels.com>, Ryan Ellis <REllis@energyfuels.com>, Jaime Massey <JMassey@energyfuels.com>

Ted and Mike,

Attached please find the updated Rim Mine Stormwater Pollution Prevention Plan (SWPPP). This SWPPP was updated to include current site contact information and to reflect existing site conditions. It is sent to you digitally and for informational purposes only but if you would like a printed copy of the SWPPP or would like to comment on its contents please contact me.

Thank you,
Andrea

[Energy Fuels Resources]Energy Fuels Resources (USA) Inc.

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2 attachments

 image003.png
5K

 2015-12-22 RM SWPPP.pdf
4166K

Mike Bradley <mbradley@utah.gov>

Fri, Jan 8, 2016 at 1:55 PM

To: Andrea Reither <AReither@energyfuels.com>

Andrea,

It may be a pipe dream, but I would like to see SWPPP maps take on a dual function as the surface hydro maps for the NOI, if only to reduce the burden on the operator to produce required maps for the NOI. In my opinion, the

SWPPP maps could easily show the information required to illustrate to us what measures will be used to protect surface water systems as required in various places in the rules (R647-4-105.1.12, 2.11 & 3.15; R647-4-106.9; R647-4-107.2 & 3; R647-4-109.1).

With that in mind, I only have a few comments that don't really require changes (for DOGM) unless you would like to use them for this multi-tasking concept. On Figure 1, the two main areas are properly identified. However, on Fig. 3, the portal is ID'd as the Columbus Portal. As I understand it, it should be the Humbug Portal, shouldn't it?

On Fig. 2, there is a topsoil pile located to the north that is outside the "Mine and Disturbance Area Boundary" (DAB). This pile is considered disturbed area by OGM, and should be inside the DAB, or have it's own small DAB.

There is a second topsoil pile located just west of the development rock stockpile, and a third located just west of the dewatering treatment ponds. For all of these topsoil piles, are there any down-gradient berms or anything to contain sediment coming from those stockpiles? There is nothing shown on the maps, like a containment berm. I would recommend that berms or something be installed to prevent topsoil from washing downstream.

There's not much topsoil there to begin with, and it would be a shame to see it slowly wash away.

In the text it says that sediment is periodically removed from the SW pond and placed on the development rock stockpile. Is it possible to put that sediment on the topsoil stockpiles instead? I don't know the quality of that sediment, whether it has some hazardous characteristics or not, but I was just wondering if it could be re-used as a topsoil supplement.

Again, I was looking at this from the perspective of someday amending the NOI, not in lieu of DWQ's acceptance. If you feel like taking these comments and revising your current NOI plans, it would be a pretty simple amendment.

Thanks for copying us.

[Quoted text hidden]

—

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Telephone follow-up on Jan. 9, 2016:

Spoke with Andrea Reither of EFR regarding comments. She agreed on first comment about portal name. Agreed on second comment about including topsoil pile in disturbed area, but concluded that vegetated topsoil stockpiles don't need down-gradient bmps. They should be labeled as "Vegetated Topsoil Piles."

BLM requires material removed from ponds to be placed in development rock pile due to potential for radiological contamination, so can't add it to topsoil supply.